

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE**

In re:

FTX TRADING LTD., *et al.*,¹

Debtors.

Chapter 11

Case No. 22-11068 (JTD)

(Jointly Administered)

**Ref. Docket Nos. 1324, 1325, 1406, 1467,
and 1567**

**NOTICE OF THE DEBTORS' AND THE OFFICIAL COMMITTEE OF UNSECURED
CREDITORS' EXHIBIT LIST AND INTENT TO OFFER WITNESS
TESTIMONY AT THE HEARING ON JUNE 8, 2023 IN CONNECTION WITH THE
JOINT MOTION OF THE DEBTORS AND THE OFFICIAL COMMITTEE OF
UNSECURED CREDITORS FOR AN ORDER AUTHORIZING THE MOVANTS TO
REDACT OR WITHHOLD CERTAIN CONFIDENTIAL INFORMATION OF
CUSTOMERS AND PERSONAL INFORMATION OF INDIVIDUALS**

PLEASE TAKE NOTICE that FTX Trading Ltd. and its affiliated debtors and debtors-in-possession (collectively, the “Debtors”) and the Official Committee of Unsecured Creditors (the “Committee” and, together with the Debtors, the “Movants”) appointed in the above-captioned chapter 11 cases (the “Chapter 11 Cases”) hereby provide the following information regarding the witnesses they intend to present, and the list of the potential exhibits that they may seek to introduce into evidence, at the hearing scheduled on June 8, 2023 (the “Hearing”) on the *Joint Motion of the Debtors and the Official Committee of Unsecured Creditors for an Order Authorizing the Movants to Redact or Withhold Certain Confidential Information of Customers and Personal Information of Individuals* [D.I. 1324] (the “Joint Motion”):

¹ The last four digits of FTX Trading Ltd.’s and Alameda Research LLC’s tax identification number are 3288 and 4063 respectively. Due to the large number of debtor entities in these Chapter 11 Cases, a complete list of the Debtors and the last four digits of their federal tax identification numbers is not provided herein. A complete list of such information may be obtained on the website of the Debtors’ claims and noticing agent at <https://cases.ra.kroll.com/FTX>. The principal place of business of Debtor Emergent Fidelity Technologies Ltd is Unit 3B, Bryson’s Commercial Complex, Friars Hill Road, St. John’s, Antigua and Barbuda.

EXHIBITS

In connection with the Hearing on the Joint Motion, the Movants may seek to introduce into evidence any one or more of the following documents:

Ex. #	Description
1.	Declaration of Jeremy A. Sheridan in Support of the Joint Motion of the Debtors and the Official Committee of Unsecured Creditors for an Order Authorizing Movants to Redact or Withhold Certain Confidential Information of Customers and Personal Information of Individuals [the “ <u>Declaration</u> ”, D.I. 1325]
2.	Resume of Jeremy A. Sheridan [D.I. 1325, Ex. A]
3.	Erika Harrell, <i>Victims of Identity Theft, 2018</i> , BUREAU OF JUSTICE STATISTICS (Apr., 2021), https://bjs.ojp.gov/library/publications/victims-identity-theft-2018 [D.I. 1325, Ex. B].
4.	Zhiyuan Sun, <i>Crypto Users Claim Gemini Email Leak Occurred Much Earlier Than First Reported</i> , COINTELEGRAPH, (Dec. 14, 2022), https://cointelegraph.com/news/crypto-users-claim-gemini-emailleak-occurred-much-earlier-than-first-reported [D.I. 1325, Ex. C]
5.	<i>Business Email Compromise</i> , FBI, https://www.fbi.gov/how-we-can-help-you/safetyresources/scams-and-safety/common-scams-and-crimes/business-email-compromise (last visited Apr. 10, 2023) [D.I. 1325, Ex. D].
6.	The 2023 Crypto Crime Report, CHAINALYSIS, (Feb. 2023), https://go.chainalysis.com/2023-crypto-crime-report [D.I. 1325, Ex. E].
7.	Robert McMillan, <i>A Text Scam Called ‘Pig Butchering’ Cost Her More Than \$1.6 Million</i> , WALL ST. J. (Oct. 20, 2022), https://www.wsj.com/articles/a-text-scam-called-pig-butchering-cost-her-morethan-1-6-million-11666258201 [D.I. 1325, Ex. F].
8.	Jared Peck, <i>Have Money for a Latte? Then You Too Can Buy a Phish Kit</i> , PROOFPOINT, (Dec. 16, 2021), https://www.proofpoint.com/us/blog/threat-insight/have-money-latte-then-you-too-can-buy-phish-kit . [D.I. 1325, Ex. G]
9.	James Nani, <i>Scammers, Posing as Kirkland Lawyers, Phishing Celsius Customers</i> , BLOOMBERG LAW (Dec. 1, 2022), https://news.bloomberglaw.com/bankruptcy-law/scammers-posing-askirkland-lawyers-phishing-celsius-customers [D.I. 1325, Ex. H]
10.	<i>Notices of Phishing Attempts, In re Celsius Network LLC</i> , Case No. 22-10964 (MG) (Bankr. S.D.N.Y.) [Docket Nos. 1527, 1681, 1904, 1992 and 2082] [D.I. 1325, Ex. I].

11.	Hr'g Tr. (Feb. 6, 2023), <i>In re Celsius Network LLC</i> , Case No. 22-10964 (MG) (Bankr. S.D.N.Y. Feb. 6, 2023) [Docket No. 2016] [D.I. 1325, Ex. J].
12.	Mark Sweney, <i>Darktrace Warns of Rise in AI-Enhanced Scams since ChatGPT Release</i> , THE GUARDIAN, (Mar. 8, 2023), https://www.theguardian.com/technology/2023/mar/08/darktrace-warns-of-rise-inai-enhanced-scams-since-chatgpt-release [D.I. 1325, Ex. K]
13.	Francisco Memoria, <i>Victim of Brazil Bitcoin Ransom Kidnapping Plot Rescued</i> , CCN, (last modified on Mar. 4, 2021), https://www.ccn.com/victim-of-brazilian-bitcoin-ransom-kidnapping-rescued [D.I. 1325, Ex. L]
14.	Jamie Redman, <i>London College Student Robbed at Knifepoint by 8 Thugs for \$93k in Bitcoin</i> , BITCOIN.COM, (Sept. 25, 2021), https://news.bitcoin.com/london-college-studentrobbed-at-knifepoint-by-8-thugs-for-93k-in-bitcoin [D.I. 1325, Ex. M]
15.	Chris Morris, <i>Some Teenagers Are Making a Fortune Trading Bitcoin—One Even Got Kidnapped Because of His Success</i> , FORTUNE, (Oct. 21, 2021), https://fortune.com/2021/10/21/trading-bitcointeenagers-kidnapped [D.I. 1325, Ex. N]
16.	Rob Davies, 'Crypto Muggings': Thieves in London Target Digital Investors by Taking Phones, THE GUARDIAN, (May 8, 2022), https://www.theguardian.com/technology/2022/may/08/cryptomuggings-thieves-in-london-target-digital-investors-by-taking-phones [D.I. 1325, Ex. O]
17.	Michael Hill, Dan Swinhoe, <i>The 15 Biggest Data Breaches of the 21st Century</i> , CSO, (Nov. 8, 2022), https://www.csoonline.com/article/2130877/the-biggest-data-breaches-of-the-21st-century [D.I. 1325, Ex. P]
18.	<i>17 Biggest Crypto Heists of All Time</i> , COINTELEGRAPH, (Mar. 10, 2023), https://cointelegraph.com/explained/the-biggest-crypto-heists-of-all-time . [D.I. 1325, Ex. Q]
19.	Lorenzo Franceschi-Bicchierai, <i>Cops Arrest Infamous SIM Swapper Who Allegedly Stole \$14 Million in Cryptocurrency</i> (Oct. 11, 2018), https://www.vice.com/en/article/7x3may/cops-arrest-sim-swapper-14-million-cryptocurrency [D.I. 1325, Ex. R]
20.	Any rebuttal or impeachment exhibits

INFORMATION ON WITNESS NUMBER ONE

1. Name and title of witness: Kevin M. Cofsky, Partner at Perella Weinberg Partners L.P., the Debtors' investment banker.

2. Scope of testimony: Mr. Cofsky will testify regarding the potential value of the Debtors' customer lists and related matters in connection with the Joint Motion.
3. Direct testimony of witness: The Movants will elicit direct or rebuttal testimony from Mr. Cofsky at the Hearing.
4. Location and place from which the witness will testify: Mr. Cofsky will be available to testify in person.

INFORMATION ON WITNESS NUMBER TWO

1. Name and title of witness: Jeremy A. Sheridan, Managing Director in the Blockchain and Digital Assets practice for FTI Consulting, Inc.
2. Scope of testimony: Mr. Sheridan will testify regarding the matters set forth in his Declaration.
3. Direct testimony of witness: Mr. Sheridan's direct testimony has been presented through the Declaration. The Committee may elicit additional direct or rebuttal testimony from Mr. Sheridan at the Hearing.
4. Location and place from which the witness will testify: Mr. Sheridan will be available to testify in person.

RESERVATION OF RIGHTS

The Movants reserve all rights to: (i) amend and supplement this exhibit and witness list at any time at or prior to the Hearing; (ii) use additional exhibits for purposes of rebuttal or impeachment and to supplement the foregoing exhibit list as appropriate; (iii) rely upon and use as evidence (a) any exhibits included on the exhibit lists of any other party in interest and (b) any pleading, hearing transcript, order, or other document filed with the Court in these Chapter 11 Cases or any adversary proceeding; (iv) cross examine any and all witnesses proffered at the Hearing; and (v) call any rebuttal witnesses as the Movants may deem necessary at the Hearing.

Dated: June 6, 2023
Wilmington, Delaware

LANDIS RATH & COBB LLP

/s/ Kimberly A. Brown

Adam G. Landis (No. 3407)
Kimberly A. Brown (No. 5138)
Matthew R. Pierce (No. 5946)
919 Market Street, Suite 1800
Wilmington, Delaware 19801
Telephone: (302) 467-4400
Facsimile: (302) 467-4450
E-mail: landis@lrclaw.com
brown@lrclaw.com
pierce@lrclaw.com

-and-

SULLIVAN & CROMWELL LLP

Andrew G. Dietderich (admitted *pro hac vice*)
James L. Bromley (admitted *pro hac vice*)
Brian D. Glueckstein (admitted *pro hac vice*)
Alexa J. Kranzley (admitted *pro hac vice*)
125 Broad Street
New York, NY 10004
Telephone: (212) 558-4000
Facsimile: (212) 558-3588
E-mail: dietdericha@sullcrom.com
bromleyj@sullcrom.com
gluecksteinb@sullcrom.com
kranzleya@sullcrom.com

Counsel for the Debtors and Debtors-in-Possession

June 6, 2023
Wilmington, Delaware

YOUNG CONAWAY STARGATT & TAYLOR, LLP

/s/ Robert F. Poppiti, Jr.

Matthew B. Lunn (No. 4119)

Robert F. Poppiti, Jr. (No. 5052)

1000 North King Street

Wilmington, DE 19801

Telephone: (302) 571-6600

Facsimile: (302) 571-1253

Email: mlunn@ycst.com

rpoppiti@ycst.com

-and-

PAUL HASTINGS LLP

Kristopher M. Hansen*

Kenneth Pasquale*

Erez E. Gilad*

Gabriel E. Sasson*

Isaac S. Sasson*

200 Park Avenue

New York, NY 10166

Telephone: (212) 318-6000

Facsimile: (212) 319-4090

Email: krishansen@paulhastings.com

kenpasquale@paulhastings.com

erezgilad@paulhastings.com

gabesasson@paulhastings.com

isaacsasson@paulhastings.com

**Admitted pro hac vice*

*Counsel to the Official Committee of Unsecured
Creditors*